

ECSD Compliance Schedule Monthly Status Update – As Submitted on 11/24/21

Listing of Non-Conformances			Compliance Timeline				
Ct.	Description of Non-Conformance	Citation No.	By 09/30	By 10/31	By 11/30	By 12/31	Relevant Comment(s)
District's Assessment of the Various Non-Compliances & Preparation of Written Plan of Action.			Immediately initiated, thoroughly analyzed and completed by 9/13/21				
01	Pre-Treatment Program Mod. & Local Limits	1.2					Director is Addressing
02	IU Characterization	2.0	Completed				Compliance Timely Achieved
Control Mechanisms (CM)			per Natalie Maupin, Pretreatment Compliance Coordinator, IDEM				
03	Control Mechanisms (CM) – Slug Plan Inclusion	3.1	Completed on 10/14 and ahead of schedule				With the exception of certain Permittees (i.e., GATX) Slug Discharge Control plan is required of all Dischargers
04	CM – Significant Change Notification	3.2	Completed on 10/14 and ahead of schedule				Significant Change provision included within revised permit for all dischargers
05	CM – Self Monitoring Reports	3.3	District considering IDEM's Response				IDEM Responded on 11/19
06	CM – Phenol Sample Collections	3.4	Completed on 10/14 and ahead of schedule				Sampling methodology changed within all permits
07	CM – No Local Limit for Silver	3.5	Completed on 10/14 and ahead of schedule				All permits reviewed an AG limit deleted as applicable
08	CM – COD Duplication	3.6	Completed on 10/14 and ahead of schedule				All permits reviewed as AG limit deleted as applicable
09	CM – TTO Methodology Typo	3.7	Completed on 10/14 and ahead of schedule				All permits reviewed as TTO methodology was corrected as applicable
10	CM – Sample Type Error	3.8	Completed on 10/14 and ahead of schedule				All permits reviewed as TTO sample type was corrected as applicable
11	CM – Usage of Certain Symbols	3.9	Completed on 10/14 and ahead of schedule				All permits reviewed and the removal of nebulous symbolism was removed
Application of Pretreatment Standards & Requirements (APSR)			per Natalie Maupin, Pretreatment Compliance Coordinator, IDEM				
12	APSR – Cyanide Monitoring	4.0(a)					Work in Process
13	APSR – TTO Monitoring	4.0(b)					Continuing to Seek IDEM's Input
Compliance Monitoring (CMon)			per Natalie Maupin, Pretreatment Compliance Coordinator, IDEM				
14	CMon – Inspection Monitoring	5.0	Completed by 10/31				All Permittees were Inspected during 2021
15	CMon – Self Monitoring	5.1					Continuing to Seek IDEM's Input
16	CMon – SIU Compliance Inspections	5.2(a)	Completed by 10/31				All Permittees were Inspected during 2021
17	CMon – SIU & CIU Slug Discharge Control Plan	5.2(b)	Completed on 10/14 and ahead of schedule				With the exception of certain Permittees (i.e., GATX) Slug Discharge Control plan is required of all Dischargers
18	CMon – Submission of Self-Monitoring Report	5.3(a)					Continuing to Seek IDEM's Input
19	CMon – Self-Monitoring Report Frequency	5.3(b)	Completed on 10/14				Compliance requirement communicated within email communique to all Permittees
20	CMon – Chronic SNC Violations	6.0					Work in Process
21	CMon – Submission of Annual Report	7.0					Work in Process
Issuance of IU Control Mechanism (CMon)			per Newton Ellens, Pretreatment Program Manager, USEPA				
22	CMon – Statement of Non-Transferability	8.0	Completed on 10/14 and ahead of schedule				Statement of Non-Transferability included within all permits
23	CMon – Multiple Categorizations Listed	9.0					Work in Process
24	CMon – Monthly Categorical Limits Required	10.0					Work in Process
25	CMon – Monitoring Waiver Provision	11.0	Completed on 10/14 and ahead of schedule				Monitoring Waiver Provision included within all revised permits
26	CMon – Nebulous Symbolism	12.0	Completed on 10/14 and ahead of schedule				All permits reviewed and the removal of nebulous symbolism was removed
27	CMon – Sampling Requirements	13.0	Completed on 10/14 and ahead of schedule				All permits revised to include Alternate Sampling requirement
28	CMon – Reporting Requirement	14.0					Continuing to seek USEPA input

29	CMon – Report Submission Requirement	15.0					Continuing to seek USEPA input
30	CMon – Records Transparency	16.0					Continuing to seek USEPA input
31	CMon – Alternate Categorical Requirements	17.0					Work in Process
32	CMon – Significant Change Notification	18.0	Completed on 10/14 and ahead of schedule				Significant Change provision included within revised permit for all dischargers
33	CMon – Slug Discharge Control Plan	19.0	Completed on 10/14 and ahead of schedule				With the exception of certain Permittees (i.e., GATX) Slug Discharge Control plan is required of all Dischargers
Control Authority Compliance Monitoring (CACM)			per Newton Ellens, Pretreatment Program Manager, USEPA				
34	CACM – No Inspection Report	20.0(a)	Completed by 10/31				All Permittees were Inspected during 2021
35	CACM – Sample Collection Location	20.0(b)	Non-Issue				In Compliance
36	CACM – Non-Issuance of NOV	21.0		Continued Work in Process			Additional time required
37	CACM – Lack of Chronic SNC Violations	22.0					Work in Process
38	CACM – Public Posting of SNC Violations	23.0					Work in Process
39	CACM – Lack of Enforcement Escalation	24.0					Work in Process
Industrial User Self-Monitoring (IUSM)			per Newton Ellens, Pretreatment Program Manager, USEPA				
40	IUSM – Lack of Self-Monitoring Reports	25.a	Completed by 10/14				Compliance requirement communicated within email communique to all Permittees
41	IUSM – Phenol Sample Collection	25.b	Completed on 10/14 and ahead of schedule				Sampling methodology changed within all permits
42	IUSM – Report Certification	25.c	Completed on 10/14 and ahead of schedule				Compliance requirement communicated within email communique to all Permittees
43	IUSM – Notification of Discharge Violation	25.d	Completed on 10/14 and ahead of schedule				Notification of Discharge Violation included within revised permit